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Proposed Counsel to the Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SABON HOLDINGS, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-11320 (JLG)

(Joint Administration Requested)

**NOTICE OF COMMENCEMENT OF
CHAPTER 11 CASES AND FIRST DAY HEARING**

PLEASE TAKE NOTICE that on May 29, 2020 (the “Petition Date”), Sabon Holdings, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “First Day Hearing”) has been scheduled for June 10, 2020 at 2:00 p.m. (Eastern Time) before the Honorable James L. Garrity Jr., United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004, in order to consider, among other things, the relief requested by the Debtors in the First Day Pleadings (as defined below). In light of COVID-19, the First Day Hearing will be conducted telephonically.

PLEASE TAKE FURTHER NOTICE that parties wishing to participate in the First Day Hearing must make arrangements through CourtSolutions LLC (www.courtsolutions.com). Instructions to register for CourtSolutions LLC are attached to the Court’s General Order M-543.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: SABON HOLDINGS, LLC (9131), SABON MANAGEMENT, LLC (9205), SABON 78 7TH AVE, LLC (4824), SABON 458 BWY, LLC (5760), SABON 782 LEX, LLC (6496), SABON 1276 LEX, LLC (4675), SABON AMERICAN DREAM, LLC (3633), SABON 1371 6TH AVE, LLC (6176), SABON 2052 BWY, LLC (6388), SOAPIA, Inc. (8472), SABON RF, LLC (6097), SABON WEB, LLC (6450), SABON 1450 BWY, LLC (2810) and SABON WILLIAMSBURG, LLC (1159). The mailing address and principal place of business of the Debtors is 584 Broadway Avenue, Suite 601, New York, NY 10012.

PLEASE TAKE FURTHER NOTICE that copies of each pleading identified below can be viewed and/or obtained by accessing the Court's website at www.nysb.uscourts.gov. Note that a PACER password is needed to access documents on the Court's website.

PLEASE TAKE FURTHER NOTICE that the First Day Hearing may affect your rights. Please read the below motions and applications to be heard at the First Day Hearing (the "First Day Pleadings") carefully and discuss them with your attorney. (If you do not have an attorney, you should consider consulting with one.)

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the First Day Pleadings, or if you want the Court to hear your position on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not follow the foregoing steps, the Court may decide that you do not oppose the relief requested in the First Day Pleadings and may enter orders granting the relief requested by the Debtors.

PLEASE TAKE FURTHER NOTICE that an agenda for the First Day Hearing is set forth below.

AGENDA FOR FIRST DAY HEARING

A. Motions and Applications to be Heard at the First Day Hearing:

1. **Joint Administration.** *Debtors' Motion for an Order Authorizing Joint Administration of the Debtors' Chapter 11 Cases.* [Docket No. 2]
2. **Utilities.** *Debtors' Motion for Approval of Adequate Assurance of Payment to Utility Services and Continuation of Service.* [Docket No. 4]
3. **Employee Wages.** *Debtors' Motion for Order Authorizing Debtors (i) to Pay Certain Prepetition Wages and Reimbursable Expenses and (ii) Continue Employee Benefits Plan.* [Docket No. 5]
4. **Rejection of Unexpired Leases.** *Debtors' Motion for Authority to Reject Certain Unexpired Leases Pursuant to Section 365 of the Bankruptcy Code.* [Docket No. 6]
5. **Cash Management Systems.** *Debtors' Motion for Order Authorizing (i) Maintenance of Cash Management Systems, (ii) Continued Use of Certain Existing Bank Accounts (iii) Intercompany Transactions Affording Administrative Expense Priority To Intercompany Claims and (iv) Use of Certain Business Forms.* [Docket No. 7]
6. **Customer Satisfaction.** *Debtors' Motion for Order Authorizing Debtors in Possession to Honor Customer Obligations and to Continue Customer Programs.* [Docket No. 8]

7. **DIP Financing.** *Debtors' Motion for Interim and Final Orders (i) Authorizing Debtors to Incur Postpetition Secured Superpriority Indebtedness Pursuant to Sections 105(A), 362, 364(C)(1), 364(C)(2) and 364(C)(3), (ii) to Modify the Automatic Stay, and (iii) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(B) and 4001(C).* [Docket No. 10]

B. Related Pleadings

First Day Declaration. *Declaration of Yale Scott Bogen in Support of First Day Motions and Applications in Compliance with Local Rule 1007-2.* [Docket No. 3]

Dated: New York, New York
June 3, 2020

SMITH, GAMBRELL & RUSSELL, LLP

By: /s/John G. McCarthy
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